

Exhibit B

to

Complaint

for Patent Infringement

Claim Chart¹ for the '101

Patent

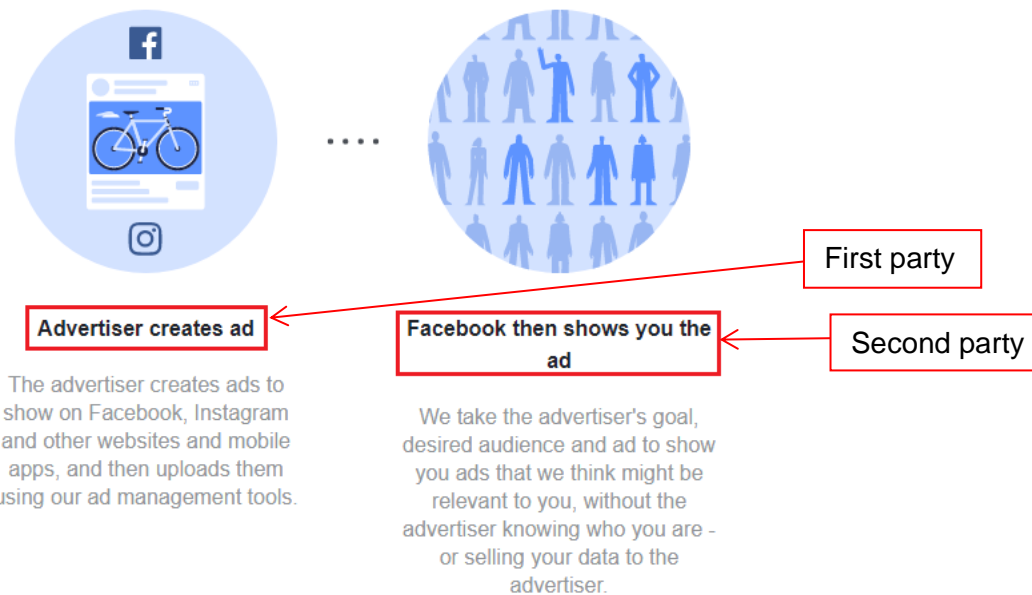
¹ Plaintiff provides this exemplary claim chart for the purposes of showing one basis of infringement of one of the Patent-in-suit by Defendant's Accused Products as defined in the Complaint. This exemplary claim chart addresses the Accused Products broadly based on the fact that the Accused Products infringe in the same general way. Plaintiff reserves its right to amend and fully provide its infringement arguments and evidence thereof until its Preliminary and Final Infringement Contentions are later produced according to the court's scheduling order in this case.

CLAIM CHART

U.S. PATENT NO. 8,719,101 B1 – CLAIM 1

Claim 1	Corresponding Structure in Accused Systems – Meta Platforms, Inc.
<p>[1a] A method of online advertising, comprising:</p>	<p>Meta Platforms, Inc. (“Meta”) provides an online platform for targeting an audience to generate advertising leads, known as Meta Lead Ads. <i>See</i> https://en-gb.facebook.com/business/ads/lead-ads?ref=ads_guide# and https://www.facebook.com/business/help/1481110642181372?id=735435806665862.</p> <p>Meta Lead Ads can allow users to stay on the platform using instant lead forms. This means users are not sent to an external landing page and can access advertiser offers without leaving the Facebook or Instagram apps.</p> <p>An Instant Form is the form used in a lead ad to obtain information from the people you reach via your ads. Using an Instant Form allows you to collect contact information from people who may be interested in your business or service without requiring those people to leave Facebook or Instagram.</p> <p>Source: (https://www.facebook.com/business/help/761812391313386?id=735435806665862)</p> <p>Meta Lead Ads together with various equipment, services, components, and/or software utilized in providing Meta Lead Ads collectively include a system and method of on-line advertising as described by the meaning of this claim. Meta Lead Ads is made available by a system owned and/or operated by Meta.</p> <p>“Because infringement liability is not dependent on ownership, e.g., use of a system can infringe (35 U.S.C. § 271), infringement is not dependent on ownership of all limitations of a claim.”</p>
<p>[1b] providing an advertisement associated with a first party for display in a network communication delivered to a computing device of a recipient during a browsing session, wherein the advertisement contains an interactive element displayed within the advertisement, and wherein the network communication</p>	<p>Meta Lead Ads can allow advertisers (the first party) to create advertisements that are then provided to users through the Facebook website or mobile app (the second party). Meta Ads Manager can allow advertisers to add an interactive element displayed within the advertisements in the form of call-to-action buttons, such as “learn more” or “sign up” buttons.</p> <p>The following exemplifies this limitation’s existence in Accused Systems:</p>

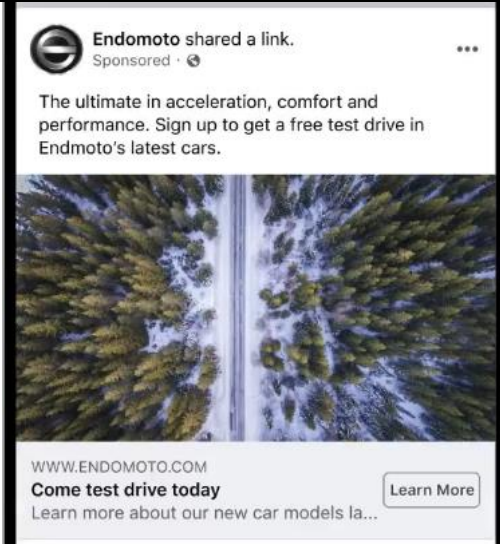
is associated with a second party different than the first party;



Source: (<https://www.facebook.com/about/ads>)

Ads Manager lets you add a **call-to-action button** to your ads to encourage people to take an action that aligns to your campaign goal. The list of call-to-action buttons that you can choose from differs for each campaign objective. You can use the [Ads Guide](#) to learn which call-to-action buttons are available for each ad format.

Source: (<https://en-gb.facebook.com/business/help/410873986524407>)

	 <p>Source: (https://en-gb.facebook.com/business/ads/lead-ads?ref=ads_guide#)</p>
<p>[1c] receiving an indication that the recipient activated the interactive element displayed within the advertisement;</p>	<p>Meta Ads Manager can allow advertisers to add an interactive element displayed within the advertisements in the form of call-to-action buttons, which the target recipient can click on. Meta Ads Manager can store unique link clicks using sampled metrics, which indicate that the recipient clicked on the call-to-action button displayed within the advertisement.</p> <p>The following exemplifies this limitation's existence in Accused Systems:</p> <p>Ads Manager lets you add a call-to-action button to your ads to encourage people to take an action that aligns to your campaign goal. The list of call-to-action buttons that you can choose from differs for each campaign objective. You can use the Ads Guide to learn which call-to-action buttons are available for each ad format.</p> <p>Source: (https://en-gb.facebook.com/business/help/410873986524407)</p>

	<p>Sampling may be used to calculate unique people-based metrics in Ads Manager and the Ads Insights API. Unique people-based metrics are metrics that refer to the number of unique people, rather than the number of actions taken.</p> <p>Most unique metrics also contain the word unique (e.g. unique link clicks), which makes them easy to identify. Using sampling on these metrics allows our system to surface ads metrics as quickly as possible. Non-unique metrics, such as impressions or clicks, don't use sampling. In the case of non-unique metrics, the metrics you see are based on all of the data available, and not just a sample.</p> <p>Source: (https://en-gb.facebook.com/business/help/1691983057707189?id=354406972049255)</p>
<p>[1d] determining, in response to the receiving the indication, whether an identifier containing unique identifying information about the recipient is present on the computing device;</p>	<p>Meta Lead Ads can use cookies to store and receive identifiers and verify user account logins. When a user logs in to Facebook, user details are stored in a cookie to allow the user to navigate between pages without having to log in every time. The cookie allows the site to identify the user. When a target user clicks on an ad, Meta Lead Ads can automatically pull information from the person's profile to complete prefilled fields on the form.</p> <p>The following exemplifies this limitation's existence in Accused Systems:</p> <p>Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones and other devices. Other technologies, including data that we store on your web browser or device, identifiers associated with your device and other software, are used for similar purposes. In this policy, we refer to all of these technologies as "cookies".</p> <p>Authentication</p> <p>We use cookies to verify your account and determine when you're logged in so that we can make it easier for you to access the Meta Products and show you the appropriate experience and features.</p> <p>Source: (https://www.facebook.com/policy/cookies/)</p> <p>To make the form on your lead ad easier for people to complete, you can add prefilled fields to your Instant Form when creating it. Prefilled fields will automatically pull information from the person's Facebook or Instagram profile to complete the form.</p> <p>Source: (https://en-gb.facebook.com/business/help/438193446367413?id=735435806665862)</p>

[1e] if the identifier containing unique identifying information about the recipient is not present on the computing device:

causing a text field to be displayed in at least a portion of the advertisement;

receiving contact information inputted into the text field by the recipient;

generating a user profile associated with the recipient based on the contact information; and causing an identifier associated with the user profile to be stored on the computing device of the recipient;

Meta Lead Ads can prompt the target user to enter missing information that could not be pulled from their profile into a text field within the lead ad. This information can be associated with the user through cookies.

The following exemplifies this limitation's existence in Accused Systems:

An Instant Form is the form used in a lead ad to obtain information from the people you reach via your ads. Using an Instant Form allows you to collect contact information from people who may be interested in your business or service without requiring those people to leave Facebook or Instagram.

Source: (<https://www.facebook.com/business/help/761812391313386?id=735435806665862>)

People can edit any prefilled information **except** for their date of birth.

If someone's information (e.g. email address, phone number) is not already included on their Facebook or Instagram profile, they'll be prompted to add the fields manually before submitting the Instant Form.

Source: (<https://www.facebook.com/business/help/761812391313386?id=735435806665862>)

Site features and services

We use cookies to enable the functionality that helps us provide the Meta Products.

For example: Cookies help us store preferences, know when you've seen or interacted with Meta Products' content and provide you with customised content and experiences. For instance, cookies allow us to make suggestions to you and others, and to customise content on third-party sites that integrate our social plugins. If you are a Facebook Page administrator, cookies allow you to switch between posting from your personal Facebook account and the Facebook Page. We use cookies such as the session-based "presence" cookie to support your use of Messenger chat windows.

	<p>We may place cookies on your computer or device and receive information stored in cookies when you use or visit:</p> <ul style="list-style-type: none"> • The <u>Meta Products</u>; • Products provided by other members of the <u>Meta Companies</u>; and • Websites and apps provided by other companies that use the Meta Products, including companies that incorporate Meta technologies into their websites and apps. Meta uses cookies and receives information when you visit those sites and apps, including <u>device information</u> and information about your activity, without any further action from you. This occurs whether or not you have a Facebook account or are logged in. <p>Source: (https://www.facebook.com/policy/cookies/)</p>
<p>[1f] if the identifier containing unique identifying information about the recipient is present on the computing device:</p> <p>retrieving a user profile associated with the recipient from a visitor information database using at least a portion of the identifier, wherein the user profile comprises at least delivery method preferences and demographic information;</p>	<p>Meta Lead Ads can use cookies to store and receive identifiers and verify user account logins. When a user logs in to Facebook, user details are stored in a cookie to allow the user to navigate between pages without having to log in every time. The cookie allows the site to identify the user. When a target user clicks on an ad, Meta Lead Ads can automatically pull information from the person's profile to complete prefilled fields on the form. These prefilled fields can include contact information and demographic information.</p> <p>The following exemplifies this limitation's existence in Accused Systems:</p> <p>Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones and other devices.</p> <p>Other technologies, including data that we store on your web browser or device, identifiers associated with your device and other software, are used for similar purposes. In this policy, we refer to all of these technologies as "cookies".</p>

We use cookies if you have a Facebook account, use the [Meta Products](#), including our website and apps, or visit other websites and apps that use the Meta Products (including the Like button). Cookies enable Meta to offer the Meta Products to you and to understand the information that we receive about you, including information about your use of other websites and apps, whether or not you are registered or logged in.

Advertising, recommendations, insights and measurement

We use cookies to help us show ads and to make recommendations for businesses and other organisations to people who may be interested in the products, services or causes they promote.

Source: (<https://www.facebook.com/policy/cookies/>)

There are the multiple prefilled fields available when creating Instant Forms.

Contact fields	User information	Demographic questions	Work information
<ul style="list-style-type: none"> Email address Phone number Street address City County/region County Country Postcode Postcode 	<ul style="list-style-type: none"> Full name First name Last name 	<ul style="list-style-type: none"> Date of birth Gender Marital status Relationship status Military status 	<ul style="list-style-type: none"> Job title Work phone number Work email address Company name

Source: (<https://en-gb.facebook.com/business/help/438193446367413?id=735435806665862>)

[1g] retrieving additional information associated with the advertisement based on at least a portion of the user profile associated with the recipient;

Meta Ads Manager can allow advertisers to retrieve additional information associated with the advertisement such as the recipient's location and availability. It can also provide the recipient with information about the closest physical location for the service or product, such as a vehicle dealership, based on this information.

The following exemplifies this limitation's existence in Accused Systems:

There are the multiple prefilled fields available when creating Instant Forms.

Contact fields	User information	Demographic questions	Work information
<ul style="list-style-type: none"> Email address Phone number Street address City County/region County Country Postcode Postcode 	<ul style="list-style-type: none"> Full name First name Last name 	<ul style="list-style-type: none"> Date of birth Gender Marital status Relationship status Military status 	<ul style="list-style-type: none"> Job title Work phone number Work email address Company name

Source: (<https://en-gb.facebook.com/business/help/438193446367413?id=735435806665862>)

Add custom questions.

Tailor your questions in lead ads so you can uncover their preferences, and ensure that you're reaching out to the correct people with the right information.

Implement the dealer locator.

Once a potential vehicle customer completes a form to find out more, show them where the closest dealership is located and let them sign up for a test drive.


	<p>Allow people to book with appointment scheduling.</p> <p>Don't wait to send a follow-up email to determine a customer's preferred appointment time and date. Once someone has filled in your form, they can also indicate when would be best of them to meet, decreasing the number of follow-ups needed.</p> <p>Source: (https://en-gb.facebook.com/business/ads/lead-ads?ref=ads_guide#)</p>
<p>[1h] delivering the additional information to the recipient based on the delivery method preferences, the delivering being performed without interrupting the browsing session of the recipient; and</p>	<p>Meta Lead Ads can allow target users to engage with advertisements without leaving the app or manually entering all of their information. This lets the users sign up for receiving more information without interrupting their browsing session. Meta Lead Ads can allow advertisers and customers to immediately get in touch with each other through phone, Messenger, and WhatsApp.</p> <p>The following exemplifies this limitation's existence in Accused Systems:</p> <p>These days people expect to be able to do everything from their phones. Mobile phones are where people communicate and discover the things they like, but historically, it's been difficult for people on mobile to signal to businesses that they want to learn more about their products or services. That's why a few months ago we announced that we were testing a new solution called lead ads that gives people a quick and privacy-safe way to sign up to receive information from businesses, like newsletters, quotes and offers.</p> <p>Retrieve and respond to leads in real-time</p> <p>The easiest and fastest way to retrieve lead information is to set up lead ads to sync with a CRM solution from one of our integrated marketing platforms. Our current partners include Driftrock, Marketo, Maropost, Oracle Marketing Cloud, Sailthru, and Salesforce, and we're working to expand the list of integrated marketing platforms in the coming months. If you work with one of our integrated marketing platforms, you can collect lead information in real-time, helping you keep up with customer expectations that once they reach out to a business, they will hear back quickly.</p> <p>You can also collect leads in real-time by setting up a custom integration between your CRM and the Facebook API. Or you can download lead information manually into a CSV file.</p> <p>Source: (https://www.facebook.com/business/news/lead-ads-launch)</p>

	<p>Lead ads make the mobile signup process easier by automatically populating contact information that people have given Facebook, like email addresses. We're testing different versions of lead ads that would let people sign up for things like newsletters, price estimates, follow-up calls and business information.</p> <p>The lead ads that we're testing use a native signup flow within Facebook. This helps avoid a lot of the pain points usually associated with filling out forms, like having to leave one app and start a form in another app, and having to enter all of their information from scratch. Just a few taps and people are done.</p> <p>Like our other ad formats, we've built this ad type with privacy in mind. People can edit their contact information, and information isn't sent to the business until a person clicks the "submit" button. Advertisers may only use this information in accordance with their privacy policies, which we make available in the lead ad before people click submit. Advertisers are also restricted from re-selling lead information to third parties.</p> <p>Source: (https://www.facebook.com/business/news/lead-ads#)</p>
--	--

Meet people where they are.


Drive lead generation by connecting with potential customers through their preferred mode of communication – via forms, calls or messages.

Get started




Quickly connect with new customers using lead ads.

Learn more




Get in touch over the phone with call ads.

Learn more



Start conversations with ads that click to Messenger.

Learn more



Chat with customers with ads that click to WhatsApp.

Learn more

Source: (<https://en-gb.facebook.com/business/goals/generate-leads?ref=goals#>)

Ads that click to message send people who click on your ads directly into conversations with your business in Messenger, Instagram or WhatsApp. You can select multiple messaging app destinations (where your conversation will take place) such as Instagram and WhatsApp, while creating your ad. This allows you to reach people on the app where a conversation is most likely to happen.

Source: (<https://en-gb.facebook.com/business/help/1816962591668838?id=371525583593535>)

[1i] recording the activation by the recipient of the interactive element as recipient tracking data in an analytics server, the recipient tracking data being associated with the unique identifying information about the recipient.

Meta Lead Ads can record advertisements' unique clicks and lead data. The advertiser can use Meta Ads Manager to download the leads data. Meta Ads Manager can use sampling to calculate unique people-based metrics. Meta's privacy policy states that it provides advertisers with information about what ads people engaged with alongside when and where the ad was engaged with. The target user of the ad must give permission for the advertiser to receive the identifying information, which can be facilitated through the call-to-action button on ads.

The following exemplifies this limitation's existence in Accused Systems:

When people click on your ad, they will be prompted to fill out your form. After people have submitted your form, you can download your leads data directly from Meta Ads Manager or Meta Business Suite, or connect to a CRM system such as Mailchimp or Salesforce.

Source: (<https://www.facebook.com/business/help/1481110642181372?id=735435806665862>)

Sampling may be used to calculate unique people-based metrics in Ads Manager and the Ads Insights

API. Unique people-based metrics are metrics that refer to the number of unique people, rather than the number of actions taken.

Most unique metrics also contain the word unique (e.g. unique link clicks), which makes them easy to identify.

Using sampling on these metrics allows our system to surface ads metrics as quickly as possible. Non-unique metrics, such as impressions or clicks, don't use sampling. In the case of non-unique metrics, the metrics you see are based on all of the data available, and not just a sample.

Source: (<https://en-gb.facebook.com/business/help/1691983057707189?id=354406972049255>)

We provide advertisers with reports about the number and kinds of people who see and engage with their ads. These reports include information about the general demographics and interests of people who engaged with an advertiser's ad. Then advertisers can better understand their audience. [See an example.](#)

Meta also provides advertisers and their business partners with information about:

- Ads people engaged with, if any
- When people engaged with ads
- Where that ad was shown (for example, on Instagram, or on Facebook)

But we don't share information with these advertisers and their business partners that by itself can be used to contact or identify you, such as your name or email address, unless you [give us permission](#).

Source: (<https://www.facebook.com/privacy/policy?subpage=4.subpage.2-AdvertisersAndAudienceNetwork>)